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Attorneys for Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Bankruptcy Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**STIPULATION BETWEEN THE
DEBTORS AND THE FEDERAL
AGENCIES EXTENDING TIME TO FILE
MOTION PURSUANT TO FED. R.
BANKR. P. 3018(a) AND AMENDING
AMENDED ORDER ESTABLISHING
SCHEDULE FOR DISCLOSURE
STATEMENT APPROVAL AND PLAN
CONFIRMATION**

Re: Dkt. No. 5732

[No Hearing Requested]

1 This stipulation and agreement for order (“**Stipulation and Agreement for Order**”) is
2 entered into by PG&E Corporation and Pacific Gas and Electric Company, as debtors and
3 debtors in possession (collectively, the “**Debtors**”) in the above-captioned chapter 11 cases (the
4 “**Chapter 11 Cases**”), and the United States of America, through the Department of Justice, on
5 behalf of the Department of Homeland Security, Federal Emergency Management Agency; the
6 United States Department of Agriculture, United States Forest Service; the United States
7 Department of the Interior, Bureau of Land Management, Bureau of Indian Affairs, Fish and
8 Wildfire Service, and the National Park Service; the United States General Services
9 Administration; the United States Department of Housing and Urban Development; and the
10 United States Small Business Administration (collectively, the “**Federal Agencies**”). The
11 Debtors and the Federal Agencies are referred to in this Stipulation and Agreement for Order
12 collectively as the “**Parties**,” and each as a “**Party**.” The Parties hereby stipulate and agree as
13 follows:

14 **RECITALS**

15 A. On February 11, 2020, the United States Bankruptcy Court for the Northern
16 District of California (the “**Bankruptcy Court**”) entered the *Amended Order Establishing*
17 *Schedule for Disclosure Statement Approval and Plan Confirmation* [Docket No. 5732] (the
18 “**Scheduling Order**”)¹, which, among other things, scheduled the deadline for any creditor to
19 file a motion pursuant to Bankruptcy Rule 3018(a) seeking to temporarily allow its Claim or
20 Interest in a different amount for purposes of voting to accept or reject the Plan as March 6,
21 2020, at 4:00 p.m. (Prevailing Pacific Time).

22 B. Counsel for the Federal Agencies has requested, and counsel for the Debtors has
23 agreed, that the time for the Federal Agencies to file a motion pursuant to Bankruptcy Rule
24 3018(a) be extended.

25
26 _____
27 ¹ Capitalized terms used but not otherwise herein defined have the meanings ascribed to such
28 terms in the Scheduling Order.

NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER, THAT:

1. The time for the Federal Agencies to file and serve a motion pursuant to Bankruptcy Rule 3018(a) is extended through 4:00 p.m. (Prevailing Pacific Time) on March 20, 2020.

2. Except as expressly set forth herein, all other provisions of the Scheduling Order shall remain in full force and effect and shall not be impacted by this Stipulation.

3. This Stipulation shall constitute the entire agreement and understanding of the parties relating to the subject matter hereof and shall supersede all prior agreements and understandings relating to the subject matter hereof.

4. This Stipulation may be executed in counterparts, each of which shall be deemed an original but all of which together shall constitute one and the same agreement.

5. The Bankruptcy Court shall retain jurisdiction to resolve any disputes or controversies arising from this Stipulation.

Dated: March 3, 2020

WEIL, GOTSHAL & MANGES LLP
KELLER BENVENUTTI KIM LLP

/s/ Jane Kim

Jane Kim

*Attorneys for Debtors
and Debtors in Possession*

Dated: March 3, 2020

UNITED STATES DEPARTMENT OF
JUSTICE, CIVIL DIVISION

/s/ Matthew J. Troy

Matthew J. Troy
Mary Schmergel

Attorneys for the Federal Agencies